



GOVERNMENT OF PUERTO RICO
DEPARTMENT OF PUBLIC SECURITY
Puerto Rico Police Bureau

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PROVISIONAL WORK PLAN DATA QUALITY DATA USE OF FORCE REPORT

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A. Introduction

The Agreement for the Sustainable Reform of the Puerto Rico Police provides that the Puerto Rico Police Bureau (hereinafter, PRPB) shall maintain a reliable and accurate use of force tracking system for all PRPB Members, pursuant to paragraphs 41 and 218 through 221. As part of its compliance with this Agreement, PRPB developed a provisional module in the Radio Control Operations Center until a system is developed.

The Monitor's Office has noted in the semi-annual reports certain inconsistencies related to the number of use of force incidents. There is a concern regarding the use of force management being reported from the field. It should be noted that as part of the assessment process to identify flaws in data quality, the following findings were detected:

- A. The Deputy Superintendent in Field Operations and the Use of Force Incident Investigation Division had their own use of force statistics independent of the official statistics that had to be extracted from the use of force module operating in Radio Control.
- B. The personnel assigned to enter the data into the use of force module operated at Headquarters, however, the information was provided by telephone call through the thirteen (13) Command Centers located in the Area Command offices, who in turn collected the data from the Districts and Precincts.
- C. Lack of supervision in the number of supervisors in the field to ensure that the required PPR-s be completed in a complete and timely manner.
- D. Need to update information systems to collect, analyze, and report reliable use of force data effectively and efficiently.
- E. Need to update processes for reporting all incidents where a person or vehicle is detained and not free to leave, regardless of the outcome of the detention (e.g., arrest, citation, warning) and including the development of policies, training, and supervision plans.
- F. Lack of equipment to implement information systems and provide the necessary tools to PRPB Members to report incidents and uses of force effectively and efficiently.

- G. Need to implement a data quality control method to validate and certify use of force data.
- H. Need to formally train PRPB Members on information systems, at the Police Academy.
- I. Need to ensure that all uses of force related to an incident are collected and tracked with a unique control number, including when force is applied by more than one PRPB unit.

As a result of the preliminary findings of the Monitor's Office, PPR-126.2, entitled: "Complaint Card" (PPR-126.2), was revised to establish the data elements for purposes of collecting the correct number of use of force incidents. Once the PPR was approved, programming was initiated in the Information Systems. It should be noted that in May 2021, implementation began in the thirteen (13) police areas, and it was completed in August 2021. Likewise, a statistical dashboard was developed where the use of force incidents can be visualized as they are entered into the PPR- controlled PPR-126.2.

As requested by the Monitor's Office, Precinct, District and Unit supervisors, directors and Command Center supervisors shall be responsible for assessing the quality of data across the thirteen (13) Command Centers. At the Reform case status hearing held on January 14, 2022, the Federal Monitor reported that discrepancies in the use of force data continued in his Fifth Report submitted on December 20, 2021. As a result, Honorable Judge Francisco Besosa ordered PRPB to develop a work plan to address concerns related to the quality of data collected on use of force incidents. For the reasons set forth above, this provisional work plan is set forth with measures to validate the data on uses of force in the short and medium term. In particular, this provisional plan addresses the points related to issues A, B, and I, above. Issue C related to the lack of oversight will be addressed in the long term in accordance with the oversight implementation plan. See *Minutes of Proceedings* ¶ 4, Dkt. 1945 (Jan. 14, 2022). Issues D, E, F, G, y H will be addressed in the long term pursuant to the *Joint Stipulation for an*

Information Systems and Technology Needs Assessment, and Action Plan, Dkt. 1961
(Feb. 28, 2022).

B. Implementation of Provisional Validation Work Plan

A. Objectives

1. Form PPR-126.2 will be used for the initial recording of a use of force event.
2. As a source of record for use of force statistics; Form PPR-605.1 will be used, because it includes a supervisory and Work Unit Director review, and a more accurate statistical report.
3. Development of reconciliation reports between PPR-126.2 and PPR-605.1 forms to identify any discrepancies in force reporting and develop a process to rectify those discrepancies.
4. Correcting deficiencies in the quality of data collected on use of force incidents by Members of the Puerto Rico Police Bureau.
5. Ensure that all uses of force related to an incident are collected and tracked using a unique complaint number for each use of force incident including specialized units in order to provide accurate use of force numbers.
6. Include a process that notifies the officer of the time in which to complete the applicable use of force incident form(s) and establish an alarm for supervisors to indicate when use of force incident reports have not been entered into the GTE system.
7. Development of a Dashboard based on form PPR-605.1 in lieu of PPR-126.2.

B. Action Plan

1. To collect and validate reliable and accurate use of force statistics, the PRPB will take the following actions:
 - a. Within 10 working days of the approval of this Plan, the PRPB

will issue a directive reminding all personnel of the importance of completing within established time frames all reports required by General Orders 601 and 605, including forms PPR-126.2 and PPR-621.1, on use of force. Also, include as an important note section B (subsection 4, p. 17 of GC 605) wherein it states the following:

“Any act or omission that violates the provisions of this General Order shall be referred to and investigated by SARP, in accordance with applicable regulations. Any PRPBM who fails to comply with any provision of this General Order shall be subject to disciplinary sanctions, possible criminal charges and/or civil action, as appropriate.”

- b. Within 10 working days of the approval of this Plan, the PRPB will issue a directive requiring Command Center Directors, through their shift supervisors and shift supervisors assigned to districts or precincts in their police area, to ensure that daily and on every work shift, PPR-126. 2, the PPR-621.1, and the use of force reports (PPR-605.1), as well as that they are completed through the GTE System.
- c. The Supervisors of each shift, assigned to the districts and/or precincts, shall verify that forms PPR-126.2 and PPR-605.1 are completed in their entirety. In those cases where they have not been completed, or have been completed incorrectly, they will interview personnel to identify the causes and take action to ensure that reports are submitted completely through the GTE System
- d. In the event that a proper supervisor is not present on shift, the Precinct, District and/or Unit Director will be responsible for evaluating, approving and signing all forms related to their personnel's uses of force, entered into the GTE System.
- e. Command Center Supervisors will compile the information entered on the complaint card and validate it against the use of force

reports generated through the GTE System. To meet this requirement, all Command Center Supervisors were provided access to the Use of Force Dashboard so that they can validate the PPR-126.2 forms using the information in the use of force reports (PPR-605.1) and the PPR-621.1 as they are posted. In that regard, it will be possible to monitor that the number of use of force incidents is being accounted for correctly. Command Centers will report any discrepancies in the use of force information on the PPR-126.2 and PPR-605.1 forms to the Field Operations Deputy Superintendent (FODS) Operational Statistics Section.

- f. Within 10 working days of approval of this Plan, the PRPB will issue a directive holding the FODS Operational Statistics Section accountable to monitor Command Centers that, in conjunction with supervisors in the field, ensure that Forms PPR-126.2 and PPR-605.1 are reconciled for information related to Use of Force Incidents. To comply with this requirement, personnel in that section were provided access to the Dashboard and the GTE System, so that they can access and review all reports from all police areas.
- g. The Operational Statistics Section Supervisor, after evaluating the information from the Command Centers and confirming the existence of a discrepancy in the use of force information, will request that the forms be updated with the correct information. In the event that the PPR-126.2 form needs to be corrected, the modification will be requested to the corresponding Supervisor, in coordination with the corresponding Command Center. In the event that it is the PPR-605.1 form that needs to be modified, it shall be requested to the Supervisor, in coordination with the Unit Director.
- h. No data from the PPR-605.1 form will be integrated into the use of force module and therefore the Dashboard, until the use of force information is validated by the field supervisor. The supervisor will have five (5)

working days to validate and sign off on each use of force incident involving one of his/her subordinates that is entered into the GTE System. After this process the data will be integrated into the use of force module and Dashboard.

- i. As part of this process and within 60 working days from the approval of this Plan, the interface will be available, in which it is expected that 100% of the PPR-605.1 forms, that are entered into the use of force module and Dashboard, will be reviewed and validated by the Unit Director. Further, 95% of the PPR-605.1 forms entered into the use of force module and Dashboard are expected to be consistent with the data collected in the reconciliations between the PPR-126.2 and PPR-605.1 forms.
2. To ensure that all uses of force related to an incident are collected and tracked using a unique complaint number, the PRPB will implement the following actions within sixty (60) days of approval of this plan:
 - a. Coordinate and conduct a meeting with the specialized work units, i.e. Drug Bureau, SWAT, DOT, CIT, to establish and clarify the processes for reporting use of force incidents to ensure that only one complaint number is used.
 - b. Fifteen (15) days after said meeting, said agreements shall be established by Guideline.
 - c. The developer shall be requested to make such changes to the GTE System as may be necessary to put into effect the processes set forth in the Guideline.

C. Activities

1. The FODS Deputy Commissioner, will designate a project manager. This person will ensure that the validation and monitoring processes are carried out.

2. The need for a use of force coordinator to monitor and validate the uses of force entered on forms PPR-126.2 and PPR-605.1 will be assessed. This coordinator will be designated by the FODS.
3. To correct deficiencies in the quality of data collected on use of force incidents by PRPB Members, required modifications and changes will be made to the validation rules for Forms PPR-126.2 and PPR-605.1 current versions and available from the GTE no more than **130 days** from approval of this Plan. Such update shall consist of the following:
 - a. Continue using the PPR-126.2 form for the initial indication of a use of force event, but not as a source of record for use of force statistics.
 - b. Develop analytical reconciliation reports between the PPR-126.2 and PPR-605.1 forms to identify any discrepancies in the use of force reports and create a process to rectify the discrepancies. Finding any errors in the use of force section (quantity and/or levels) will allow the supervisor to amend the PPR-126.2 form into an updated version without affecting the original and the PPR-605.1 form, if necessary. These analytical reports may include methods to identify the following:
 - i. Uses of force that are on Form **PPR-126.2** but not on **PPR-605.1** to facilitate reconciliation of use of force statistics. This report will generate a list of missing events that were not reported on Form **PPR-605.1**, the source of record for use of force reports
 - ii. Uses of force that are on Form **PPR-605.1** but not on **PPR-126.2** to facilitate reconciliation of use of force statistics. This report will generate a list of events that were missing from the original complaint card, form **PPR-126.2**.

- iii. Uses of force that are on both forms¹, but the actual data is different (i.e., Form **PPR-126.2** reports 3 uses of force while Form **PPR-605.1** reports 4 uses of force). This report provides a list of events that were possibly incomplete on the original complaint card, form **PPR-126.2**.
- iv. Complete form **PPR-605.1** according to the time frame stipulated in the General Order.
 - 1) This report is important to identify use of force reports submitted within the timeframes agreed upon in the policies and procedures pertaining to uses of force.
 - 2) This report will also be used to observe historical trends in timely case processing exposure.
 - 3) Both reports will be used together to ensure that there is no current or systemic delay in the exposure of use of force data.
- c. Form PPR-605.1 will be used as the source of record for use of force statistics because it includes a more accurate supervisory review and statistical reporting.
- d. Rebuild the Dashboard based on form PPR-605.1 instead of PPR-PPR-126.2 for the purpose of displaying and analyzing the total types of force applied, number of use of force incidents, and number of PRPBMs involved. Filters and different views will be added to ensure that the data is more informative, dynamic and motivating to use. The Dashboard may be configured to have the data in real time with appropriate timing to account for lags in data reporting. The submitted data will be used to create the Dashboard as it will be updated making the historical data less subject to change. In addition, supplement the Dashboard with additional analytical

¹ Although this may happen occasionally, identifying where this occurs frequently may be enlightening for management to take action to address any deficiencies in compliance with Form **PPR-126.2**.

management tools to ensure data quality.

These analytical reports will include methods to identify the following:

- i. Uses of force that appear on Form PPR-126.2, but are not on PPR-605.1, to facilitate reconciliation of use of force statistics.
 - 1) This report will provide a list of missing events and that have not been reported on the PPR-605.1 form, which will be the source for use of force reports.
 - 2) Rigorous review of this report should ensure that this is a rarely occurring event.
 - ii. The Supervisor signature requirement will be added to form PPR-126.2, along with a directive to the supervisor to validate the entire [sic] especially the use of force section before the information is entered.
 - iii. If the Supervisor does not sign the PPR-126.2 form, the Agent may not continue filling out or completing the other forms (PPR-605.1) pertaining to the incident.
4. An interface will then be developed so that the data from the use of force section included in the PPR-605.1 form will be passed directly to the Use of Force Investigation Module, attached to the Use of Force Investigation Unit (FIU). In this way, use of force notifications and complete incident data will go directly to the Module, minimizing manual data entry. Following the development of the interface, the possibility of eliminating the PPR-605.3 use of force notification form will be evaluated, as the PPR-126.2 and PPR-605.1 forms will integrate the data and information into the Module directly.

ATTACHMENT A

Description of the Flowcharts

The initial flowchart is from the Command Center where data entry begins in the PPR-PPR-126.2, and then, it moves to the second flowchart which is where the Agents continue to complete the other applicable reports. Upon completion of the above, they move to the other flowchart which describes the process flow in the Use of Force Investigation Module, which is the responsibility of the Use of Force Investigation Unit (FIU). This diagram shows the flow of data collected in the GTE, using the current forms module, PPR-126.2 and PPR-605.3. In the long term, forms PPR-126.2, PPR-605.1 and PPR-621.1, among others, will be integrated through the development of interfaces for data integration (ETL) between the applications.

This diagram will emphasize the flow of processes over the uses of force in the GTE System. When the PPR-126.2 form is completed in the CAD, all included data elements will be integrated directly into the GTE System, where the Agent will verify that it is complete in all its parts. In the case of use of force, the Agent must validate that the **Yes** box is selected and the Use of Force **Level** used in the incident. If there is a change in the Use of Force Level or if the Use of Force incident did not occur, you have the opportunity to amend or update the PPR-126.2 form. This applies if the officer has not completed any other reports, e.g., PPR-621.1, PPR-605.1, PPR-605.2 or PPR-605.3. Otherwise, if you have completed any of these forms, the GTE System will not allow you to update PPR-126.2. This is how it works today. The process is represented in the GTE (Use of Force) flowchart in the yellow rectangles with black letters.

The recommended modifications are represented with red letters, yellow rectangles and blue rectangles. The required changes to the validation rules for forms PPR-126.2, PPR-621.1, PPR-605.1 and PPR-605.3 in the GTE System will consist of the following:

1. Authorization and signature of the supervisor on form PPR-126.2 to continue with the process of completing the other forms (PPR-621.1, PPR-605.1, among others). These are included in the yellow and blue rectangle included in the GTE (Use of Force)

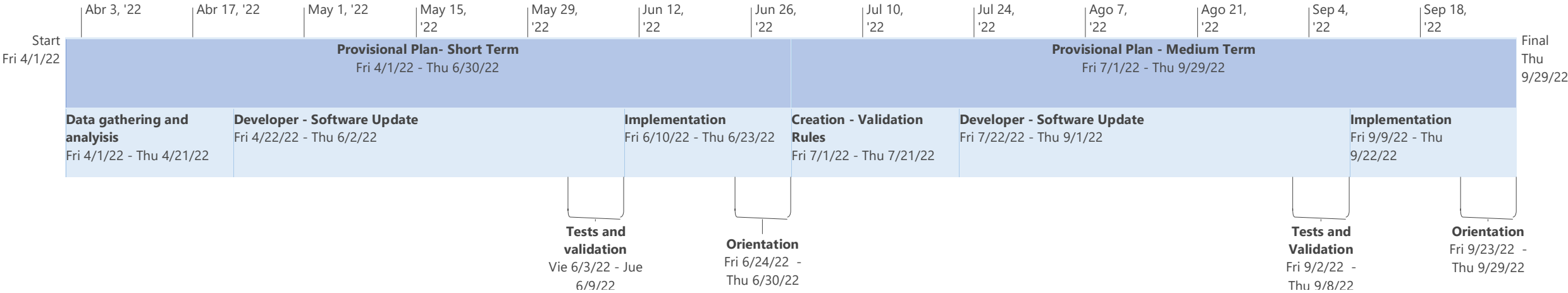
Flowchart. If the Supervisor does not sign the form, the Agent will not be able to continue filling out or completing the other dependent forms.

2. Supervisor verification of form PPR-126.2 in case any changes are needed. (Supervisor's signature is required).
3. If any errors are found in the use of force section (amount and/or levels) by the Supervisor, FIU, Use of Force Incident Review Boards (FRB) and/or Commissioner's Use of Force Incident Review Board (CFRB) on the PPR-621.1, PPR-605.1, and PPR-605.2 forms, it will allow the Agent to amend the PPR-126.2. This process is shown in the yellow rectangles and red letters in the flow chart.

An interface will then be developed so that the data from the use of force section of the PPR-126.2 form will go directly into the Use of Force Investigation Module, used by FIU, as well as the data entered on the PPR-605.1 form. Thus, the use of force notifications and complete incident data will be integrated directly into the module, minimizing manual data entry, as shown in the GTE flowchart and the Use of Force Investigation Module in the red letters of the automated ETL process.

ATTACHMENT B

This Timeline will be modified with the new dates once the Plan is approved by the parties.
(Timeline)²

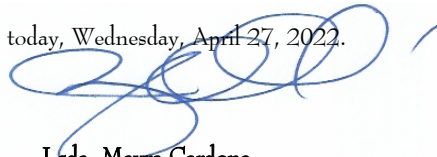


² The dates projected in this timeline may be subject to change

No. 2022-112 TRANSLATOR'S CERTIFICATE OF ACCURACY

I, Mayra Cardona Durán, of legal age, single, resident of Guaynabo, Puerto Rico, Certified Interpreter of the United States Courts (Certification No. 98-020) and certified by the National Association of Judiciary Interpreters and Translators (10671), holding a Master's Degree in Translation and admitted to the Puerto Rico Bar Association (Bar No. 12390, RUA No. 11038) hereby CERTIFY: that according to the best of my knowledge and abilities, the foregoing is a true and rendition into English of the original Spanish text, which I have translated and it is stamped and sealed as described therein. This document is comprised of Fifteen (15) Pages, including this certification page, and does not contain changes or erasures.

In Guaynabo, Puerto Rico today, Wednesday, April 27, 2022.



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